



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I-NEW ENGLAND  
5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MASSACHUSETTS 02109-3912

**URGENT MATTER – PROMPT REPLY NECESSARY**  
**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

**MAY 29 2014**

Mr. Will Whalen, Process Engineer Manager  
Circuit Connect, Inc.  
4 State Street  
Nashua, NH 03063

Re: **NOTICE OF VIOLATION** of the applicable Generators Standards of Hazardous Waste, Section 3002 of the Resource Conservation and Recovery Act of 1976 (RCRA) and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. §§ 6622(a) and 6924(d) through (m) and the State of New Hampshire Revised Statutes Annotated (RSA), Chapter 147-A, and its implementing regulations, Env-Wm Parts 100 - 1100 (Env-Wm).

Dear Mr. Whalen:

On March 27, 2014, representatives of the United States Environmental Protection Agency (EPA) conducted a RCRA Compliance Evaluation Inspection. The purpose of this inspection was to determine the compliance of Circuit Connect, Inc., EPA ID No. NHD986466688 with the State of New Hampshire Revised Statutes Annotated (RSA) Chapter 147-A, and its implementing regulations, Env-Wm Parts 100-1100 (Env-Wm) and the federal Hazardous Waste Management Regulations found at 40 CFR Parts 260- 272. The state of New Hampshire has been granted final authorization by EPA to administer certain portions of RCRA.

As a result of the inspection noted above, EPA has determined that your facility violated certain provisions of the State of New Hampshire RSA and its implementing regulations, Env-Wm Parts 100-1100. The specific violations are set forth below:

1. **Failure to label each universal waste lamp or container(s) holding universal waste lamps with any or all of the following: "Universal Waste - Lamp(s)", "Waste Lamp(s)", "Used Lamp(s)", as required by Env-Wm 1112.04**

Specifically, the following universal waste lamps were not labeled in accordance with Env-Wm 1112.04:

Two universal waste sodium lamps located in the Universal Waste storage area were in a container labeled, "Universal waste mercury containing devices".

2. **Failure to label each container used for the storage of hazardous wastes with the beginning accumulation date, as required by Env-Hm 507.03(a)(1).**

Specifically, one 55-gallon container, labeled, "Hazardous waste, spent cobra bond, D002", located in the less-than 90-day storage area.

3. **Failure to include the name of the inspector in the inspection log, as required by Env-Hm 509.02 (a)(1).**

Specifically, the inspection logs did not have the name of the inspector (and were not signed by the inspector) for the following weeks: 12/2/13, 12/9/13, 12/23/13 and 3/10/14.

You are hereby required to:

Immediately upon receipt of this **NOTICE**:

1. Label all universal waste lamp(s) with any or all of the following words: "Universal Waste – Lamp(s)", "Waste Lamp(s)" or "Used Lamp(s)", as required by Env-Wm 1112.04.
2. Label each container used for the storage of hazardous wastes with the beginning accumulation date, as required by Env-Hm 507.03(a)(1).
3. Include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions in the inspection log or summary, as required by Env-Hm 509.02 (a)(1).

Within (30) thirty calendar days of receipt of this **NOTICE**:

- a. Submit a written description, with supporting documentation, of the actions taken to correct the aforementioned violation to:

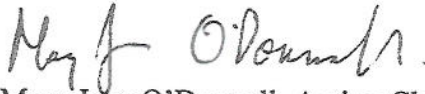
Linda Brolin, Environmental Engineer  
U.S. Environmental Protection Agency  
5 Post Office Square, Suite 1000 (OES05-1)  
Boston, MA 02109-3912

Failure to correct the violation as required by this **NOTICE** may subject the facility to further federal enforcement action, including the assessment of penalties, pursuant to Section 3008 of RCRA 42, U.S.C. § 6928.

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If you have any questions regarding this **NOTICE**, please contact Linda Brolin, at (617) 918-1876.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mary J. O'Donnell".

Mary Jane O'Donnell, Acting Chief  
RCRA, EPCRA, and Federal Programs Unit

cc: John Duclos, NH DES

